Technical Enforcement Support at Hazardous Waste Sites
TES 11 - Zone 4

06-18-93

Science Applications International Corporation
An Employee-Owned Company

American Management Systems, Inc.
A.T. Kearney, Inc.
Camp, Dresser & McKee, Inc.
Environmental Law Institute
Environmental Toxicology International, Inc.
Geosciences Consultants, Ltd.
National Investigative Services Corporation
TechLaw, Inc.
URS Consultants

DCN: TZ4-R09035-IS-M17580

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

ENVIRONMENTAL PROTECTION AGENCY
REGION IX

HAZARDOUS WASTE MANAGEMENT DIVISION
WASTE COMPLIANCE

ROLLINS OPC INC.
5756 ALBA STREET
LOS ANGELES, CA 90058

JUNE 1993

Submitted to:

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 HAWTHORNE STREET
SAN FRANCISCO, CALIFORNIA 94105

Submitted by:

SCIENCE APPLICATIONS INTERNATIONAL CORPORATION
TECHNOLOGY SERVICES COMPANY
20 CALIFORNIA STREET, SUITE 400
SAN FRANCISCO, CALIFORNIA 94111

EPA CONTRACT NO. 68-W9-0008
EPA WORK ASSIGNMENT NO. R09035
SAIC/TSC PROJECT NO. 06-0794-03-1265-110

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

September 28, 1993

CERTIFIED MAIL NO. P243065608
RETURN RECEIPT REQUESTED

WARNING LETTER

In reply, refer to H-4-3

Wilfred Ndubuizu
Environmental Affairs Manager
Rollins OPC Inc.
5756 Alba Street
Los Angeles, CA 90058

Dear Mr. Ndubuizu:

On June 18, 1993, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency (U.S. EPA) at Rollins OPC Inc. (formerly Oil Process Co.) Los Angeles, California, U.S. EPA Identification Number CAD050806850. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended [42 U.S.C. 6927]. A copy of the investigation report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with RCRA regulations and potential violations of the California authorized program under RCRA Subtitle C. Any omissions in the report shall not be construed as a determination of compliance with applicable regulations.

Pursuant to Section 3008 of RCRA [42 U.S.C. 6928] you are required to correct the identified areas of noncompliance and to submit documentation of their correction to U.S. EPA within 30 calendar days of your receipt of this letter. Your response must include a letter signed by a duly authorized official of your facility, certifying correction of the identified areas of noncompliance. Documentation of your return to compliance may consist of, among other things, photographs, manifests and revised records. Where compliance cannot be achieved within 30 days, you must provide the reasons for the delay, a description of each corrective action planned and a schedule on which each corrective action will be taken.

By copy of this letter, U.S. EPA is providing the State of California with notice of the referenced violations of Subtitle C of RCRA. U.S. EPA is also providing the State with notice that it intends to take appropriate enforcement action if the facility

does not resolve the violations within the time specified above and the State does not take appropriate enforcement action. The State of California may notify U.S. EPA of its intent to assume or decline responsibility to take such action to resolve the referenced violations.

U.S. EPA reserves the right to take further enforcement action as it deems appropriate. However, your response to this letter will be considered in determining the need for further enforcement action. Violations of Subtitle C of RCRA such as those listed in the enclosed report may be punishable by civil and criminal actions, including penalties of up to $25,000 per day for each violation as provided by Section 3008 of RCRA.

U.S. EPA routinely provides copies of investigation reports to State agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fifteen (15) working days from your receipt of this letter. U.S. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

Your response to this Warning Letter, due within 30 days of your receipt of this letter, shall be mailed to:

Diane Bodine, H-4-3
Waste Compliance Branch
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

If you have questions related to technical aspects of the investigation report or this letter, please contact Diane Bodine at (415) 744-2130.

Sincerely,

for Karen Schwinn
Chief
Waste Compliance Branch

Enc.
cc: Scott Simpson, DTSC, Reg. 3

September 28, 1993

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Rollins OPC Inc.
5756 Alba Street
Los Angeles, CA 90058

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Waste Compliance Branch
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

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Sincerely,

Karen Schwinn
Chief
Waste Compliance Branch

Enc.
cc: Scott Simpson, DTSC, Reg. 3

SYMBOL	H-4-3	H-4-3	H-4			
SURNAME	D Bodine	C Atkowski	GPC for KS			
DATE	9/16/93	9-27-93	9-27-93			

U.S. EPA CONCURRENCES OFFICIAL FILE COPY

P 243 065 608

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Sent to Wilfred Ndubuizu Envir. Affairs Mgr. Rollins OPC Inc.	
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P.O., State and ZIP Code Los Angeles, CA 90058	
Postage	$
Certified Fee	
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PS Form **3800**, June 1991

MPV Justification for OPC

Laboratory reports do not specify the analytical techniques or methods per the Duties and Requirements section of the facility's permit.

ROLLINS
ENVIRONMENTAL SERVICES

October 26, 1993

Diane Bodine, H-4-3
Waste Compliance Branch
United States EPA, Region 9
75 Hawthorne Street,
San Francisco, CA 94105-3901

Dear Ms. Bodine:

This is in response to your warning letter date September 28, 1993, regarding the results of your June 8, 1993, hazardous waste investigation. This investigation was conducted by a representative of the United States Environmental Protection Agency, at our facility located at 5756 Alba Street Los Angeles.

Your letter indicated that the said investigation identified a potential violation of the duties and requirements of section 9.c.v of our operation permit. The referenced permit section states in part: that records of monitoring information shall specify the analytical techniques or methods used. According to your report drum samples and the wastewater treatment batch #484 laboratory analysis performed from June 7, through June 18, 1993, did not specify the analytical techniques or methods used.

In response to the above question, the said tracking document report is a derivative of our waste analysis plan which constitutes the reference for all analysis conducted at the facility. As such, the report should be read in conjunction with the waste analysis plan. We feel that the appropriate techniques or methods for various tests on the two forms indicated in the report are specifically referenced in our waste analysis plan. However, to resolve any disagreement over this interpretation, we will indicate the appropriate test methods or techniques in future records of monitoring information. We trust that this will meet your interpretation of the referenced permit section.

If you have further questions, I could be reached at (213) 585-5063 or you could contact the Environmental Affairs Manager, Wilfred Ndubuizu at the same number.

Sincerely,

William J. Mitzel
President

cc: Guillermo Hernandez
Department of Toxic Substances Control
1011 No. Grandview Avenue
Glendale, CA 91201

ROLLINS ORC INC.
5756 Alba Street • Los Angeles, California 90058 • FAX: (213) 585-9214 • Phone: (213) 585-5063

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

FEB 8 1994

Wilfred I. Ndubuizu, P.E.
Environmental Affairs Manager
Rollins OPC, Inc.
5756 Alba Street
Los Angeles, CA 90058

Dear Mr. Ndubuizu,

This is to confirm the follow-up items we discussed today, 2/8/94.

A letter will be sent to me next week which addresses:

1. Explanation of long "in transit" delay on California manifests 93102430, 90943854 and 93145049 (21, 19 and 21 days in transit, respectively)
2. Bad pallets/unsafe drum handling
3. Daily inspection record of processing plant equipment inspections December 8 to end of December, 1993
4. Inspection log which now includes roll-off labels
5. Manifest return copy/paper trail for Texas manifest # 00331390 that went to Texas and was rerouted to Louisiana.

By end of February (sooner if possible) the following documents will also be provided:

1. Updated letter of credit for financial assurance of revised closure/post closure cost estimates. Please include a copy of all other RCRA-required financial assurance and liability documents.
2. New contingency plan with changed names and copies of new letters to local authorities regarding new drum storage area/waste processing area.
3. OSHA 1910 required Hazardous Operations Review which will address fire or explosion possibility due to incompatible gases mixing in the ventilation system for new building gases and tank farm gases (which are being rerouted to new thermal oxidizers).

Thank-you.

Sincerely,

Leif L. Magnuson

ROUTING AND TRANSMITTAL SLIP

Date: 9/14/93

Re: Collins OPC, Inc. (formerly Oil Process Co.) Los Angeles

		Initials	Date
1.	G. Brownlee; ~~L. Tully~~ (Proof)	GB	9/14/93
2.	G. Czajkowski, H-4-3; L. ~~Wong, H-4-1~~	GC	9-27-93
3.	Karen Schwinn, H-4	GC for KS	9-27-93
4.	G. Brownlee, H-4-3; L. ~~Tully, H-4-1~~	GB	9/28/93

From: Duane Bodine

Phone: 4-2130 Mail Code: H-4-3

DCN: TZ4-R09035-IS-M17580

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IX

HAZARDOUS WASTE MANAGEMENT DIVISION
WASTE COMPLIANCE BRANCH

Facility:	Rollins OPC Inc. 5756 Alba Street Los Angeles, CA 90058 (213) 585-5063
EPA ID Number:	CAD050806850
Date of Inspection:	June 18, 1993
Inspectors:	Scott Kinderwater Science Applications International Corporation Technology Services Company 20 California Street, Suite 400 San Francisco, CA 94111 (415) 399-0140
Facility Representatives:	William Mitzel, President Wilfred Ndubuizu, Env. Affairs Manager 5756 Alba Street Los Angeles, CA 90058 (213) 585-5063
Report Prepared By:	Scott Kinderwater
Report Date:	July 16, 1993

INTRODUCTION

On June 18, 1993, under Contract No. 68-W9-0008 with the U.S. Environmental Protection Agency, Mr. Scott Kinderwater, representing Science Applications International Corporation/Technology Services Company (SAIC/TSC), conducted an unannounced Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) at the Rollins OPC Inc. facility located at 5756 Alba Street in Los Angeles, California (EPA Identification No. CAD050806850) for the purpose of evaluating the facility's compliance with the RCRA Hazardous Waste Regulations. The facility was evaluated on compliance with the U.S. Environmental Protection Agency Permit for a Hazardous Waste Management Facility issued on July 18, 1990. Photographs were taken to document the inspection and are included as Attachment 1 of this CEI report. The RCRA CEI checklist for generators is included as Attachment 2. A list of documents referenced in preparation for the inspection and this report can be found in Attachment 3.

Rollins OPC Inc. (Rollins OPC), a wholly-owned subsidiary of Rollins Environmental Services, operates a hazardous waste treatment and storage facility in Los Angeles, California. The Rollins OPC waste management facility receives, stores, blends treats and transfers select combustible liquid wastes and sludges. Rollins OPC is not a transporter of hazardous waste.

Permit Status

The original Part A Permit Application for the facility was submitted by Oil Process Company to the California Department of Health Services (DHS) on August 6, 1980, and the facility was granted interim status to operate. Rollins OPC submitted an updated Part A application on October 14, 1992 to reflect a name change of the facility from Oil Process Company to Rollins OPC Inc. (see Attachment 4).

On June 3, 1985, Oil Process was issued a RCRA-equivalent Hazardous Waste Facility Permit (HWFP) by DHS, which expired on June 3, 1990. Oil Process

submitted a revised Part B Permit Application on March 30, 1989. The EPA and DHS issued a revised RCRA HWFP on July 18, 1990 and May 29, 1990, respectively, to allow Oil Process to continue operating a storage, treatment, and transfer facility, to close the existing drum storage/treatment tanks, and to add new tanks, a rail car storage area, and a new drum storage area. The EPA permit became effective on August 27, 1990 and expires on August 27, 1995.

On August 31, 1990, Oil Process' hazardous waste hauler's registration expired. Rollins OPC currently uses Custom Environmental Transport (CET), also a wholly-owned subsidiary of Rollins Environmental Services, for their transportation needs.

Previous Compliance Evaluation Inspections

September 25, 1991 — SAIC/TSC, representing EPA, conducted a CEI at Oil Process and evaluated them for compliance with their RCRA HWFP. Two violations were observed during that CEI.

HWFP Part IV.A

Oil Process' 1990 HWFP specified a total storage capacity of 7,480 gallons of liquid waste (136 55-gallon drums) and 14,960 gallons of solid waste (272 55-gallon drums) for the Old Drum Storage Pad. Oil Process exceeded the drum storage capacity in that over 500 drums were observed on the Drum Storage Pad and several hundred drums were observed stored around the facility.

40 CFR Part 264.177(c)

Oil Process stored eight 55-gallon containers of waste acid in the storage bay designated for basic wastes. In addition, these containers were in close proximity to containers of cyanide waste.

January 6, 1992 — SAIC/TSC conducted a CEI inspection with DTSC personnel present. No violations were found. SAIC/TSC noted that violations observed during the September 25, 1991 CEI had been rectified.

June 18 and July 24, 1992	The California Environmental Protection Agency (Cal-EPA), Department of Toxic Substance Control (DTSC) conducted a CEI at Rollins OPC. On August 4, 1992, DTSC issued a report of violations resulting from the June 18 and July 24, 1992 inspection.
December 2, 1992	DTSC conducted a CEI at Rollins OPC. Violations that were identified included failure to properly label 50 containers, failure to include the home addresses of two emergency coordinators in the contingency plan, failure to keep a container holding hazardous waste closed at all times and failure to note the time that inspections were made on daily inspection logs. A Field Order was issued by DTSC to Rollins OPC. The penalty involved and the Field Order are confidential at the time this CEI was prepared. The facility is currently in negotiations with DTSC.
March 6, 26 and April 3, 1993	DTSC conducted an inspection at the facility and the following violations were noted: storage of waste not identified in the operation plan, no secondary containment for container storage area, inadequate aisle space, improper labeling of containers, failure to inspect and document discrepancies on inspection log, stored ignitable waste was within 50 feet of the property line, waste was stored on-site over 90 days, failure to close drums when not in use.

INVESTIGATION

In preparation for this CEI, the previous CEI reports and the July 1990 RCRA Permit for a Hazardous Waste Management Facility were reviewed. A file review was conducted at the DTSC office in Glendale, California to compile information on the Rollins OPC facility. Documents reviewed include correspondence, reports of violation, state permits, and DTSC permit maintenance reports. In addition to a file review, Mr. Guillermo Hernandez and Mr. Andy Bajwa of the DTSC Glendale office were interviewed to obtain current DTSC enforcement and permitting information.

Facility Operations

Rollins OPC, formerly operating as Oil Process Company, began operations in 1979 when they were a transporter of hazardous wastes. Rollins OPC began receiving off-site generated wastes for treatment in June 1985. Currently, they operate as a drum storage facility, wastewater treatment facility, and a container repackaging facility. In addition, Rollins OPC operates as a transfer facility for CHEMPAK, Inc., a lab-packaging division of Rollins Environmental Services.

Treatment of wastewaters consists of oxidation for cyanide wastewaters, reduction of hexavalent chrome wastewaters, and solidification and neutralization of wastewaters containing heavy metals. The eventual disposal mechanism is to the sanitary sewer. Residues generated from the treatment activities (consisting of filter cake and spent activated carbon) are collected in roll-off boxes and disposed of off-site.

The container repackaging operations consist of bulking incoming wastes into homogenous waste streams for off-site disposal at one of the hazardous waste incinerators operated by Rollins Environmental Services in Deer Park, Texas or Baton Rouge, Louisiana. Residues remaining from the bulking and repackaging operations consist of crushed drums which are collected in roll-off boxes and are landfilled at Chemical Waste Management in Kettleman City, California.

Status of New Construction

Several facility modifications are being implemented to upgrade the Rollins OPC facility. No modifications to the 1990 permit are necessary because the new construction was included in the permit. Rollins OPC is continuing to operate during the new construction. A 16,000 square-foot storage and processing building is being built to be used for lab pack and drum processing. The previous drum storage pad and roll-off containing storage unit received closure certification from DTSC on September 29, 1992. While the storage and process

building is being completed, Rollins OPC is operating a permitted temporary drum storage building.

A rail car transfer station is being constructed with a scheduled completion date of September 1994.

Per page 39 of the permit, Rollins OPC stated at a meeting held with DTSC on February 19, 1993, that they still intend to add thirteen (13) new tanks to twelve (12) existing tanks to bring the number of tanks to twenty-five (25). The tanks that will be added to the existing tank system are:

Tank Number	Description	Capacity
CR-V-1	Acid Solution (Reduction Treatment)	6500 gal
CN-V-1	Caustic Solution (Oxidation Treatment)	6500 gal
CN-V-2	Caustic Solution (Oxidation Treatment)	6500 gal
PC-V-2a	1st Stage Neutralization Tank	3000 gal
PC-V-2b	2nd Stage Neutralization Tank	3000 gal
PC-V-3	Flocculation Tank	5000 gal
PC-V-4	Plate Clarifier	5000 gal
PC-V-5	Filter Press Feed	5000 gal
PC-V-6	Supernatant/Filtrate	1500 gal
OW-V-1[1]	Gravity Separation	20,000 gal
OW-V-2	Air Floatation Unit	7000 gal
PC-F-1	Sand Filter	1700 gal
UF-V-1	Ultra Filtration	to be determined

Region IX EPA is notified of all new construction progress and changes via quarterly "Permit Maintenance Reports" prepared under the supervision of the DTSC Facilities Management Branch Unit Chief (Maxine Richey).

This unannounced inspection was conducted on June 18, 1993. Mr. Kinderwater met with Mr. Mitzel and Mr. Ndubuizu before conducting the facility walk-through.

[1]OPC believes that the capacities of Tanks OW-V-1 and OW-V-2 have been reversed in the operation plan and also in the permit. OPC would like to correct this typographical error.

The facility was given a request for documents to be reviewed for compliance with the permit. This list is enclosed as Attachment 5.

Mr. Ndubuizu stated that there were no incidences, releases or catastrophic events during 1992 that would require Twenty-Four Hour Reporting. He further stated that the facility is not operating under any corrective action since there have been no reportable releases. Mr. Mitzel stated that there have been no reportable incidents in 1993.

Disposal of drums was discussed. Empty drums that are disposed by Rollins OPC are a non-RCRA waste but are California hazardous waste. Currently, Rollins OPC is not using a drum reconditioner, however, drum reconditioning facilities are being reviewed. Once a drum reconditioner is selected, this form of drum recycling will become part of Rollins OPC's waste minimization efforts.

Other waste minimization efforts were discussed. During the break down of lab packs, vermiculite inserted by generators for padding is removed by Rollins OPC and reused for padding of their shipments off-site.

Rollins OPC is proposing to implement a pretreatment process for mercury salts. This process is not authorized by the current permit. Rollins OPC is in negotiations with the DTSC Permitting Branch in Glendale for recommendations on how to include this process into their California hazardous waste permit.

Waste Acceptance

Drums of waste are off-loaded in front of the Temporary Drum Storage Pad. Waste is off-loaded from tank trucks parked inside the facility directly to the east of the guard shack. An off-loading truck and a vapor return line were observed inside the facility (Photo No. 1). The vapor return line connects to a carbon recovery unit which is part of the vapor control system (Photo No. 2).

Prior to unloading, all containers of waste are assigned an internal identification number called the Rollins OPC unique identifier number. The unique identifier number allows tracking of individual wastes as they proceed through the facility.

To confirm that incoming waste matches the profile supplied to Rollins OPC by the generator, a technician draws a sample from each drum and each tank truck load. Waste is accepted based on the analysis of this fingerprint sample. Analyses routinely performed are metals, pH, ammonia, cyanide, hydrocarbons, and fuel value (BTU). Analyses selected are determined by knowledge of the generator's profile.

If the fingerprint samples does not match the profile of the hazardous waste, OPC will reject the waste or OPC will contact the generator for permission to correct the discrepancy at the generators expense. The vapor return line connects to a carbon recovery unit which is part of the vapor control system (Photo No. 2).

Water Treatment

Desmond Phillip, the Plant Operations Manager, was present and discussed the water treatment plant. The existing treatment system consists of 12 tanks, a filter press, an activated carbon absorption unit, and a caustic scrubber. Attachment 6 is a system diagram of the waste water treatment unit which, according to Bill Mitzel, is current as of June 18, 1993. A water layer is maintained in each tank to keep monitoring probes wet. Prior to any treatment, the water in the tank is analyzed by the on-site laboratory. A sample is pulled from the drums of waste and a compatibility test is run. Secondary containment of liquids in the tanks is furnished by a 12-inch high berm which completely encircles the perimeter of the water treatment plant. Secondary containment for the entire tank process area is 100% capacity of the largest tank, Tank V9, which has a capacity of 100,000 gallons. All rainwater that falls inside the plant is collected and pumped to Tank V9 for treatment. Tank V9 previously treated oily waste water. Currently, V9 only treats rainwater (Photo No. 3).

Tank V-1, the acid treatment tank, was inspected (Photo No. 4). Besides acid neutralization, this 10,000-gallon capacity tank is also used to treat Lexavclent chrome by reduction. No treatment was occurring in Tank V-1 the day of the inspection.

Tank V-2, a 10,000-gallon tank is used for the treatment (neutralization) of basic waste (Photo Nos. 5 and 6). Cyanide destruction also occurs in this tank. Calcium hypochlorite is used as the oxidation agent for cyanide destruction and sodium hydroxide is used for pH control. The laboratory determines free cyanide concentration by distillation during analysis.

Rollins OPC employs a batch system for wastewater treatment as compared to a continuous system. In a batch system, all waste pumped into the system is neutralized or destroyed prior to the initiation of a new batch.

The fume incinerator (the inorganic vapor recovery system) was inspected (Photo No. 7). This is a closed vent system where fumes from several process areas are collected and vented to this incinerator. The combustion chamber operates at a temperature of 1600°F. Exhaust from the incinerator is monitored daily. Total organics in the exhaust range from 10ppb to 100ppb.

Drum Storage Area

Drums are segregated by hazard class into eight bays. Each bay is separated by a six-inch high concrete berm (Photo No. 8). Only drums labeled oxidizer were stored in oxidizer area. No open drums were found.

While at the temporary drum storage area, Mr. Abbey Pourhassanian, a plant supervisor, was interviewed. He was questioned on how technicians determine where to store hazardous waste drums. He described the procedure as the following steps:

1. A technician checks the hazardous waste label to insure that the label information matches the Uniform Hazardous Waste Manifest information.
2. A technician draws a fingerprint sample. The sample is analyzed in the lab. Generally, results are available in one day.
3. Finally, based on the profile and sample confirmation, the hazardous waste is placed in the temporary drum storage area by compatibility-oxidizers are stored in the oxidizer storage bay and poison wastes are stored in the poison storage bay.

If the fingerprint sample does not match the profile of the hazardous waste, OPC will reject the waste or OPC will contact the generator for permission to correct the discrepancy at the generator's expense. For example, Rollins OPC receives an incoming waste that is assumed to be blended for fuel. However, upon verification Rollins OPC discovers the waste is not suitable for fuel blending and needs to be treated as wastewater. The waste would then be diverted to a wastewater treatment process.

A drum stored in the temporary drum storage area that was labeled as EPA Waste No. F001 was inspected. The hazardous waste label further identified hazardous waste, liquid, NOx, ORME, NA9189, freon(113). The drum had attached to it a Rollins OPC unique identifier label listing this drum as 39115 (Photo No. 9).

The hazardous waste label for unique waste 39115 does not include a corresponding Uniform Hazardous Waste Manifest number (Photo No. 10). William Mitzel stated that this incoming waste will not be treated, but instead will be sent off-site for recycling since freon 113 waste is a valuable recyclable waste. Verification sampling shows this waste as containing greater than 90% freon. The waste was originally profiled by CHEMPAK on behalf of the generator. OPC has verified the concentration of freon in the waste.

During this CEI conducted by SAIC/TSC, the violations identified during the previous DTSC CEIs of Rollins OPC were further evaluated during the walk through

portion of the inspection and no containers holding hazardous waste were found to be open.

Document Review

Waste Batch 484 / Process Tank #V-2

An evaluation was performed of all related documents of Batch 484 for compliance with the monitoring and records requirements of the Permit. Documents reviewed were, the bound chronologic water treatment log (the log), the batch 484 wastewater treatment data sheets, and the corresponding treatment plant lab reports. (See Attachment 7.)

Several drums of high pH hazardous waste were pumped into tank V-2. Cyanide destruction was one of the goals for this wastewater treatment batch.

The log indicates that every discrete waste (as referenced by the unique OP#) had been previously sampled by Rollins OPC for compatibility. The log also referenced the corresponding manifest numbers to waste in batch 484. This system allows for easy verification of a wide variety of generator wastes being batch treated. Manifests, and laboratory data compliance could easily be audited.

A review of corresponding incoming Uniform Hazardous Waste Manifests showed that Rollins OPC had conducted fingerprint sampling. Fingerprint sampling reports, called Drum Sample Internal Laboratory Reports, were reviewed. The date that analyses were performed, the individual who performed the analysis and the results of analysis are included on the Drum Sample Internal Laboratory Report.

Per the Duties and Requirements section of the permit, Item 9.c.v. requires that records of monitoring information shall specify the analytical techniques or methods used. The Drum Sample Internal Laboratory Reports do not specify the analytical techniques or methods. (See Attachment 7.)

During the inspection, Desmond Phillip, Operations Manager, stated that all volumes of waste associated with this batch were pumped into process Tank V-2 on June 8. However, a review of the Wastewater Treatment Data Sheets shows that most waste was unloaded on June 7 and TRW waste was unloaded on June 9.

The wastewater treatment in Tank V-2 consists of cyanide destruction by calcium hypochlorite (oxidation agent) and sodium hydroxide for pH control.

By distillation, the lab determines the free cyanide concentration. Desmond Phillip stated that the cyanide effluent limit for discharge to the Los Angeles POTW is 0.1ppm.

To monitor wastewater treatment and to ensure that effluent limits are met, laboratory analysis of samples from batch 484 were performed on June 7, June 8, June 10, June 11, June 14, June 15, and June 18. A concentration of 0.1 ppm cyanide for Batch 484 was reported on the lab reports on June 18, 1993, the day of the compliance evaluation inspection. Laboratory methods were not indicated, per the requirements of the Permit.

The facility was preparing to further treat this batch by performing metals precipitation in Tank V-2, followed by physical separation of liquid and sludge and final polishing of the water through activated carbon before disposal to the POTW. During the review of batch 484 documentation, the log was used to verify which generator's waste was being treated. The unique Rollins OPC ID numbers listed on the log enables tracking of all batch wastes back to their corresponding manifests and assists in locating corresponding verification sample data.

Previous inspections had noted that wastes, as they were being treated, could not be tracked back in time to determine who the original generators were of the treated waste. This bound log satisfies the requirement that wastes, as they are being treated, be trackable.

Financial Assurances

Financial assurances and liability documentation is currently under review and, therefore, not available at this time. The information will be incorporated in the final CEI report, if available.

Manifests and Land Disposal Restriction (LDR) Notification

After the walk through, Rollins OPC was asked whether the facility tests waste it generates in accordance with the Toxicity Characteristic Leaching Procedure (TCLP) prior to shipment for off-site land disposal. Mr. Mitzel stated yes, the Rollins OPC lab does test waste destined for a landfill by TCLP.

However, Mr. Mitzel and Mr. Phillip stated that the sludge generated from cyanide destruction is not tested by TCLP prior to shipment for disposal. Mr. Mitzel stated that the sludge is sent to the Chemical Waste Management, Inc./Kettleman Hills facility for disposal, and that Chemical Waste Management, Inc. may or may not perform TCLP based on Rollins OPC's profile of the sludge. Per their permit, Rollins OPC uses knowledge of the waste to determine if the waste is LDR waste. Concentrations of Land Disposal Restricted waste, including chromium, were detected during initial laboratory analysis of the Batch 484 waste. After treatment, general analysis indicates that the chromium in Batch 484 had been neutralized. Performing TCLP analysis may have determined that sludge generated from treatment processes may not be restricted from land disposal.

Manifests from the period November 2, 1992, through November 30, 1992, were reviewed for compliance with LDR notification.

On November 2, 1992, Rollins OPC shipped a tanker truck of hazardous waste of mixed solvents and oil, to Rollins Environmental Services, Inc. in Texas. Texas Uniform Hazardous Waste Manifest 00096468 was reviewed as part of this CEI. All sections of the manifest were properly filled in and the manifest was signed and dated by the generator, ROLLINS OPC, and by the transporter, Matlack Inc.

Rollins Environmental Services (TX) Inc. certified receipt of the hazardous waste and signed the manifest November 4, 1992.

Rollins OPC has properly retained a copy of the manifest and the signed receipt of hazardous waste.

An LDR Notification was attached to manifest TX00096468. The related manifest was referenced on the LDR for easy identification. Since the waste is a F001-F005 waste, additional notification including treatment standards for these wastes is included with the LDR.

During a telephone conversation on June 25, 1993, Mr. Wilfred Ndubuizu stated that generator knowledge was used to determine that waste under manifest TX00096468 required land disposal restriction notification. As an example, Rollins OPC received a hazardous waste shipment (manifest 90786979) of spent solvents from SYNTEX USA on Oct. 21, 1992. This generator's waste was commingled with other generators' waste. Incoming manifest 90786979 lists F002 and F003 waste numbers. These LDR wastes are included on Rollins OPC outgoing manifest TX00096468 and the appropriate LDR notification was attached to the manifest. No potential violations were noted during the review of manifest TX0096468.

Inspection Logs

A randomly chosen set of internal inspection logs were reviewed. Dates reviewed were January 4, 1993 through March 31, 1993. Rollins OPC maintains two different logs. One is called the "Bulk Liquid and Solid Container Area Inspection List", and the other is called the "Waste Container Storage Area Inspection Report." Each item to be inspected is marked either "yes" or "no." Items requiring correction are corrected and then explained on the log (see Attachment 8). An oil spill was detected during the daily inspection and corrected by covering the spill with vermiculite. Inspections are occurring daily and no potential violations were noted during the review. Also, Rollins OPC notes the time the inspections were performed.

Training Records

Training records were reviewed for two Rollins OPC employees, Abby Pourhassanian and Desmond Phillip. Both employees have completed 40 hours of initial hazardous waste training and both employees are up-to-date for eight hour annual refresher training. Documentation that both employees have had medical examinations during the past year (per OSHA requirements) could not be located during the inspection, however, Wilfred Ndubuizu stated that both employees have had medical examinations in the past 12 months.

Documents Required by the Permit

The following list of documents were verified during the review to be on file at the facility as specified by the Permit:

- The Emergency Contingency Plan revised in 1992.
- The Waste Analysis Plan revised in February 1992.
- The Annual Report for 1992.

Note: The updated Contingency Plan includes the home addresses and phone numbers of the emergency coordinators.

POTENTIAL VIOLATION

RCRA Permit, Duties and Requirements, Item 9.c.v.	Per the Duties and Requirements section of the permit, Item 9.c.v. requires that records of monitoring information shall specify the analytical techniques or methods used. The Drum Sample Internal Laboratory Reports do not specify the analytical techniques or methods. Nor did laboratory reports of batch 484 samples performed June 7 through June 18, 1993, indicate laboratory methods (See Attachment 7).

LIST OF ATTACHMENTS

1. Photograph Log
2. CEI Checklist for Generators
3. List of Reference Documents
4. Part A Application
5. Sets of Documents Requested from Rollins OPC on the Morning of Inspection
6. Waste Water Treatment Unit System Diagram
7. Waste Batch 484 Drum Sample Internal Laboratory Reports
8. Inspection Log Indicating Correction

ATTACHMENT 1

PHOTOGRAPH LOG

Rollins OPC

Photographs Log and Photographs
Photographer: Scott Kinderwater
Date: June 18, 1993

Photo No. 1: Vapor return line (yellow pipe) recovering vapor from an off loading tank truck.

Photo No. 2: Vapor goes to the carbon recovery unit (yellow canister) which is part of the vapor control system.

Photo No. 3: Tank V-9. A 100,000 gallon tank currently used to store collected rainwater.

Photo No. 4: Tank V-1, the acid treatment tank.

Photo No. 5: Tank V-2. Cyanide and base treatment tank. Photograph taken from interior of water treatment plant.

Photo No. 6: Tank V-2. Cyanide and base treatment tank. Photograph taken from exterior of water treatment plant. Concrete berm shown in foreground.

Photo No. 7: The fume incinerator and controls. This is a closed vent system. A standby carbon canister is located alongside the fume incinerator.

Photo No. 8: Drum and container storage in "Temporary Drum Storage Area." Note storage by compatibility - oxidizer vs. poison.

Photo No. 9: Hazardous waste drum stored in the flammable section of the "Temporary Drum Storage Area."

Photo No. 10: Close-up photograph of the Hazardous Waste Label on a drum of Freon 113. The generator of this waste is Curtis and Tompkins. The Rollins OPC unique ID number is 39115 which is used for tracking waste at the facility.

Photo No. 1: Vapor return line (yellow pipe) recovering vapor from an off loading tank truck.

Photo No. 2: Vapor goes to the carbon recovery unit (yellow canister) which is part of the vapor control system.

Photo No. 3: Tank V-9. A 100,000 gallon tank currently used to store collected rainwater.

Photo No. 4: Tank V-1, the acid treatment tank.

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Photo No. 7: The fume incinerator and controls. This is a closed vent system. A standby carbon canister is located alongside the fume incinerator.

Photo No. 8: Drum and container storage in "Temporary Drum Storage Area." Note storage by compatibility - oxidizer vs. poison.

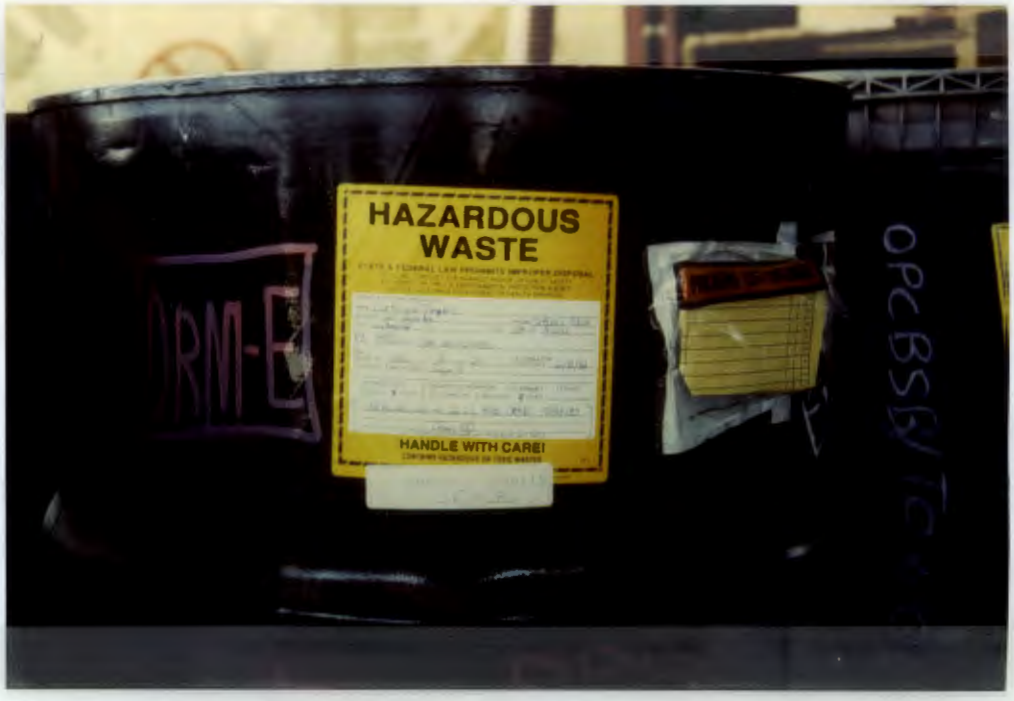


Photo No. 9: Hazardous waste drum stored in the flammable section of the "Temporary Drum Storage Area."

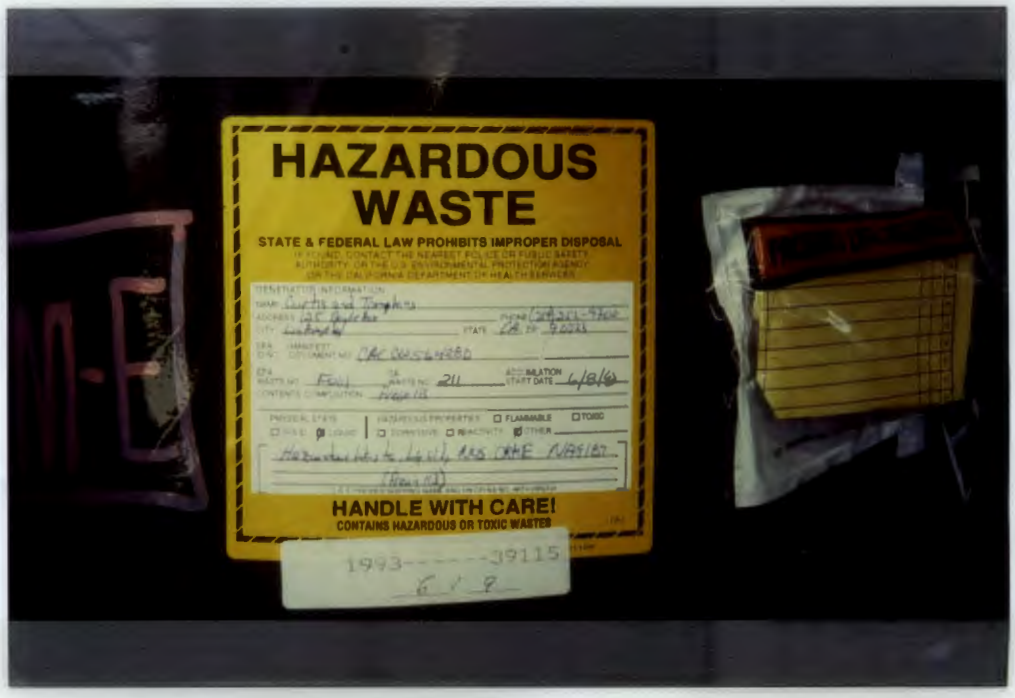


Photo No. 10: Close-up photograph of the Hazardous Waste Label on a drum of Freon 113. The generator of this waste is Curtis and Tompkins. The Rollins OPC unique ID number is 39115 which is used for tracking waste at the facility.

ATTACHMENT 2

CEI CHECKLIST FOR GENERATORS

TREATMENT/STORAGE/DISPOSAL FACILITIES (TSDF)
CEI CHECKLIST

SITE ID#: CAD C50806850 INSPECTION DATE: June 18 1993

SITE NAME: Rollins OPC Inc.

LOCATION: 5156 Alba Street

Los Angeles CA 90058
City State Zip Code

LEAD INSPECTOR: Scott Kinderwater OFFICE: SAIC/TSC

****

(line out parts of the index below not applicable to facility inspected.)

■INDEX FOR TSDF CHECKLIST - 40 CFR

Part & Page	Contents
261/262:	GENERATOR REQUIREMENTS
270:1	INTERIM STATUS QUALIFICATIONS
2	Loss of Interim Status
265:	GENERAL FACILITY STANDARDS
B1	WASTE ANALYSIS PLAN
B3	Security and Inspections
B4	Training
B6	Ignitable/Reactive/Incomp.Wastes
C1	PREPAREDNESS AND PREVENTION
D1	CONTINGENCY PLAN
D2	" - Emergency Coordinator
D4	" - Reporting
E1	MANIFEST SYSTEM & RECORDKEEPING
E2	Operating Records
E4	Biennial Report
F1	GROUND WATER MONITORING
F3	Facilities Affecting GW Quality
G1	CLOSURE & POST-CLOSURE
H1	Est. & Financial Assur.
H5	Liability Requirements
I1	STORAGE IN CONTAINERS
I3	" Accum Area Checklist
J1	HWs in TANKS

Part & Page	Contents
265:	Continued
K1	SURFACE IMPOUNDMENTS (SO4) (TO2) (D83)
L1	WASTE PILES (SO3)
M1	LAND TREATMENT (D81)
N1	LANDFILLS (D80)
O1	INCINERATORS (T03)
P1	OTHER THERMAL TREATMENT (TO4)
P2	Open Burning/Open Detonation
Q1	OTHER CHEM/PHYS/BIO TREATMENT
■W1	DRIP PADS
■AA	AIR EMISSIONS-Process Vents
■BB	AIR EMISSIONS-Leaking Equipment
266:	C1 RECYCLABLE MTLS/Use as disposal
	E1 USED OIL " " " "
	F1 PRECIOUS METALS reclamation
	G1 Lead-acid BATTERY RECLAMATION
■	H1 HW burned in Boilers/Furnaces
268:	LAND DISPOSAL RESTRICTIONS

~~Other checklists completed~~:

___ Transporter ___ Waste Minimization ___ Multi-Media

■Updated to include final and published revisions of 40 CFR through 9/30/91

Facility Representatives:

William J. Mitzel
president

Wilfred I. Ndubuizu
environmental affairs manager

Other Inspectors:

none

Documents Copied or Requested:

see attached list in report (attachment 5)

Areas Present / Inspected:

Facility Recipient of Report

Mailing Address (if different)

Rollins
DPC, Inc.
5756 Alba Street
Los Angeles CA 90058

Generators (Part 261)

	Yes	No	Comments
Does the facility qualify as a conditionally exempt small quantity generator each calendar month by:			
Generating less than 100 kgs, and accumulating less than 1000 kgs of HW on site? 261.5(a),(g) or:	___	✓	
Generating and accumulating less than 1 kg of acute HW, or 100 kgs of acute HW contaminated soil or spill residues? 261.5(e)(1-2)	___	✓	

If NO, proceed to the next page.

Did the quantity determination include all listed and characteristic wastes generated except: 261.5(d)-			N/A
(1) HW removed from on-site storage?	___	___	
(2) HW produced by on-site treatment or reclamation of HW that was already counted once?	___	___	
(3) Spent materials that have already been counted once and that are reclaimed and subsequently reused on site? or:	___	___	
HW exempted from regulation? 261.5(c)	___	___	
Does the facility generate HW?	___	___	
Has the generator of solid wastes made a HW determination by determining if the waste is: (262.11)			
(a) Excluded from regulation under 261.4?	___	___	
(b) Listed as a HW in 261 Subpart D?	___	___	
(c) For purposes of compliance with Part 268, or if the waste is not listed in Part 261, Subpart D, has the generator determined if the waste exhibits a characteristic identified in 261 Subpart C by either:			
(1) Testing the waste?	___	___	
(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used?	___	___	
(d) Excluded or restricted under 264, 265, or 268, if determined hazardous?	___	___	

[NOTE: Disposal of the following PCB wastes & materials are exempt from 40 CFR Parts 261 thru 265 & notifications of Section 3010 of RCRA: (261.8)
(1) PCB-containing dielectric fluid and electric equipment containing such fluid authorized for use and regulated under Part 761 of 40 CFR; and that
(2) Are HW only because of toxicity characteristics (Codes D018 through D04

GENERATORS
(ALL except Conditionally Exempt)
(Part 262)

	Yes	No	Comments
Has the generator submitted a Notification of Hazardous Waste Activity (EPA Form 8700-12) and obtained an EPA ID number before handling HW? 262.12(a)	✓		
Have they offered HW only to transporters or TSDs with an EPA ID#? 262.12(c)	✓		
HW Generation Points The generator may accumulate HW at or near the point of initial generation without meeting storage deadlines provided: 262.34(c)(1)			
They have accumulated no more than 55 gallons of HW or one quart of acute HW? and:			N/A facility generates > 55 gallons of HW
The area is under the control of the operator of the process generating the waste? and:			
(i) The container is in good condition, compatible with the waste, and kept closed (except when HW is being removed or added)?			
(ii) The container is marked with the words "Hazardous Waste" or other words that identify the contents?			
When HW accumulates in excess of the above amounts, does the generator: 263.34(c)(2)-			
Continue to comply with the storage requirements above? and:			
Mark the container holding the excess with the date the excess amount of HW began accumulating? and:			

	Yes	No	Comments
Comply with all 90-day storage requirements within three days? (262.34(a)	___	___	N/A

Generators of Between 100 and 1000 kg/month (Part 262)

	Yes	No	Comments
100-1000 kgs/mo. Generator Qualifications			
Does the facility generate between 100 and 1000 kilograms of non-acute* HW per month, and never accumulate more than 6000 kilograms of HW on site?	___	✓	
If NO, go to fully regulated generators.			
Has the 100-1000 kg/mo. generator accumulated HW on site for no more than 180 days without a permit or interim status? 262.34(d)**	___	___	NA
Have they accumulated less than 6000 kgs of HW on site at any time? 262.34(d)(1)	___	___	
If the generator exceeded the applicable storage time or quantity limit without an EPA extension, did they comply with all TSD storage facility regulations? 262.34(f)	___	___	
Did the 100-1000 kg/mo. generator that treats, stores, or disposes of HW on-site submit a Part A application by 3/24/87? 270.10(e)(iii)	___	___	
While accumulating waste, has the 100-1000 kg/mo. generator complied with the requirements for storage in containers, 265 Subpart I (except for the 50 foot rule (265.176))? 262.34(d)(2)	___	___	
Has the 100-1000 kg/mo. generator complied with the requirements for: 262.34(d)(4)			
265 Subpart C, preparedness and prevention? and:	___	___	
Clearly marked the date accumulation started on each container? and:	___	___	
Labelled each container and tank with the words "Hazardous Waste"?	___	___	

*Generators of more than 1 kg/mo., or who accumulate more than 1 kg at any time, of acute HW (listed in 261.33(e) are fully-regulated generators. [261.5(f)(2), revised 7/19/88].

**270 days if transported more than 200 miles to TSD facility. 262.34(e).

Continued: Generators of Between 100 and 1000 kg/mo (Part 262)

	Yes	No	Comments
Does the generator have an EMERGENCY COORDINATOR (EC) on site or immediately available at all times? 262.34(d)(5)(i)	___	___	NA
Is the following information posted next to the telephone: 262.34(d)(5)(ii)-			
(A) EC's name and phone number?	___	___	
(B) Location of fire extinguishers, spill control material, and any fire alarms?	___	___	
(C) If no direct alarms, the phone number of the fire department?	___	___	
Are all employees familiar with their jobs, proper waste handling, and emergency procedures? 262.34(d)(5)(iii)	___	___	
If an emergency has occurred, has the emergency coordinator: 262.34(d)(5)(iv)-			
(A) Tried to extinguish the fire, or called the fire department?	___	___	
(B) In the event of a spill, contained the flow of HW, and cleaned up as soon as possible?	___	___	
(C) Determined if the emergency is threatening human health or surface water outside the facility, and if so called the National Response Center at (800) 424-8802 and reported:			
(1) The generator's name, address, and EPA ID#?	___	___	
(2) Date, time, and type of incident?	___	___	
(3) Quantity and type of HW involved?	___	___	
(4) Extent of any injuries?	___	___	
(5) Estimated quantity and disposition of any recovered materials?	___	___	

Question	Yes	No	Comments
Did generator keep copies of signed manifests, waste analysis, test results, or HW determinations for 3 yrs. after the waste was last sent for on/off-site treatment, storage, or disposal? 262.44(a)			NA
Is the 100-1000 kg/mo. generator's HW reclaimed under a contractual agreement? 262.20(e)- If yes:			
(i) Does the waste reclamation contract specify the type of waste and frequency of shipments?			
(ii) Is the transport vehicle owned and operated by the recycler/ reclaimer?			
(2) Did the generator keep a copy of the contractual agreement for 3 years after the agreement ended?			
If not reclaimed under contract, complete below and "Manifests" below.			
Did the 100-1000 kg/mo. generator who has not received a signed copy of the manifest from the TSD within 60 days submit a copy of the manifest to the RA with a note indicating they have not received confirmation of delivery? 262.42(b), 262.44(b)			

MANIFESTS: - 262.20-

Question	Yes	No	Comments
(a) Does the generator prepare a complete manifest according to the instructions (see Part 262 Appendix) before transporting HW off-site?	✓		
(b) Does the generator designate on the manifest one facility which is permitted to handle the HW?	✓		I reviewed Collins UPC waste sent to Collins TX to evaluate. See manifest TX[illegible]
(c) Has the facility designated an emergency alternate facility? or:		✓	
(d) Instructed the transporter to return the waste to the generator in the event an emergency prevents delivery?	✓		

	Yes	No	Comments
Did the generator use the supplied manifest required by a consignment State: 262.21-			
(a) Where the receiving facility is located? or, if not provided by that state:	✓		
(b) Where the generating facility is located?	N/A		
(c) If not provided by either state, the EPA form from another source?	N/A		
Did the manifest consist of enough copies? 262.22	✓		yes, because one was returned to OPE
Did the generator: 262.23(a) (1) Sign the manifest by hand?	✓		
(2) Obtain the signature of initial transporter and date of acceptance on manifest?	✓		
(3) Keep one copy of the manifest (per 262.40(a))?	✓		
Did the generator give the remaining copies of the manifest to the transporter? 262.23(b)	✓		
If the SHIPMENT WAS SENT BY WATER or rail, did the generator send at least 3 copies of the manifest to the designated facilities? 262.23(c), -(d)			N/A
For hazardous waste shipments to a facility in an authorized state which is not yet authorized to regulate that waste as hazardous, has the generator: 262.23(e)			
1) Confirmed that the facility receiving the waste agrees to sign and return the manifest to the generator? and;			N/A
2) Confirmed that any out-of-state transporter signs and forwards the manifest to the designated facility?			N/A

PRE-TRANSPORT REQUIREMENTS: Part 262, Subpart C

	Yes	No	Comments
Is waste packaged in accordance with DOT packaging regulations (49 CFR 173, 178-9)? 262.30	✓		
Are waste packages labeled in accordance with DOT regulations (49 CFR 172.101)? 262.31	✓		
and; 262.32 (a) including:			
Proper shipping name [table column 2]?	✓		~~wastes ready~~
Proper ID number [table column 3A]?			not sure - ~~pretransport~~
Proper ORM designation for containers of ORM-A,B,C,D, or E wastes?	✓		
Are containers of 110 gallons or less marked with the following words: 262.32(b)			
HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.			
Generators Name & Address ________	✓		
Manifest Document Number ________	✓		
Does the generator placard or offer the initial transporter the appropriate placards (49 CFR 172 Subpart F)? 262.33			not sure ~~[illegible]~~ → waste "ready for Shipment" were not observed. the above requirements were met.

90-DAY STORAGE 262.34

	Yes	No	Comments
If the generator does not have interim status (as TSD storage facility), have they accumulated HW on-site for less than 90 days? 262.34(a)	✓		
Are containers visibly marked with the date accumulation started? 262.34(a)(2)	✓		
Is each container or tank clearly marked with the words "Hazardous Waste"? 262.34(a)(3)	✓		some containers specify "oil waste" only

ATTACHMENT 3

LIST OF REFERENCE DOCUMENTS

LIST OF REFERENCE DOCUMENTS

1. United States Environmental Protection Agency Permit for a Hazardous Waste Management Facility, dated July 18, 1990, for Oil Process Company.

2. Rollins OPC Inc. Part A Application, dated June 3, 1985.

3. Uniform Hazardous Waste Manifest TX00096468, dated November 2, 1992.

4. Rollins OPC Inc. Drum Sample Internal Laboratory Report, dated June 9, 1993. Corresponding Uniform Hazardous Waste Manifest 91033685 dated June 8, 1993. Both documents relate to unique identifier #39115.

5. Bulk Liquid and Solid Container Area Inspection Lists for the period January 1, 1993, through March 31, 1993.

6. Waste Container Storage Area Inspection Reports for the period January 1, 1993, through March 31, 1993.

7. California EPA - Department of Toxic Substances Control Permit Maintenance Reports for Rollins OPC Inc. for the period January 2, 1993, through March 26, 1993.

8. California EPA - Department of Toxic Substances Control Inspection Reports of Rollins OPC Inc., dated July 28, 1992, and March 17, 1993.

9. SAIC/TSC CEI Report for Oil Process Company, dated February 6, 1992.

ATTACHMENT 4

PART A APPLICATION

For EPA Regional Use Only

Date Received
Month Day Year

EPA

United States Environmental Protection Agency
Washington, DC 20460

Hazardous Waste Permit Application Part A

(Read the Instructions before starting)

For State Use Only

I. ID Number(s)

A. EPA ID Number

CAD050806850

B. Secondary ID Number *(if applicable)*

II. Name of Facility

Rollins OPC INC.

III. Facility Location *(Physical address not P.O. Box or Route Number)*

A. Street

5756 Alba Street

Street *(continued)*

City or Town

Los Angeles

State CA

ZIP Code 90058-

County Code *(if known)* 19

County Name Los Angeles

B. Land Type *(enter code)* P

C. Geographic Location

LATITUDE *(degrees, minutes, & seconds)* 33 59 26 N

LONGITUDE *(degrees, minutes, & seconds)* 118 14 15 W

D. Facility Existence Date

Month Day Year: 06 03 1985

IV. Facility Mailing Address

Street or P.O. Box

5756 Alba Street

City or Town

Los Angeles

State CA

ZIP Code 90058-

V. Facility Contact *(Person to be contacted regarding waste activities at facility)*

Name *(last)* Mitzel

(first) Bill

Job Title President

Phone Number *(area code and number)* 213-585-5063

VI. Facility Contact Address *(See Instructions)*

A. Contact Address Location [ ] Mailing [ ]

B. Street or P.O. Box same

City or Town

State

ZIP Code -

EPA I.D. Number *(enter from page 1)*: CAD050806850

Seconda) Number *(enter from page 1)*:

VII. Operator Information *(see instructions)*

Name of Operator: Rollins OPC INC.

Street or P.O. Box: 5756 Alba Street

City or Town: Los Angeles | State: CA | ZIP Code: 90058-

Phone Number *(area code and number)*: 213-585-5063

B. Operator Type: O

C. Change of Operator Indicator: Yes [ ] No [X]

Date Changed: Month / Day / Year

VIII. Facility Owner *(see instructions)*

A. Name of Facility's Legal Owner: Rollins Environmental Services

Street or P.O. Box: 1 Rollins Plaza

City or Town: Wilmington | State: DE | ZIP Code: 19803-

Phone Number *(area code and number)*: 302-426-2700

B. Owner Type: O

C. Change of Owner Indicator: Yes [ ] No [x]

Date Changed: Month / Day / Year

IX. SIC Codes *(4-digit, in order of significance)*

Primary	Secondary
9511 (description) Solid Waste Management	(description)
Secondary	**Secondary**
(description)	(description)

X. Other Environmental Permits *(see instructions)*

A. Permit Type (enter code)	B. Permit Number	C. Description
R	CAD050806850	RCRA
R	90-3-TS-001	State Permit
P	214934, 214933	Air Polluction Preventation
	214909, 268459	Permit Plus Permits to
	268457, 268458	Construct
E	W4854466	Industrial Waste Discharge
		Permit

EPA I.D. Number *(enter from page 1)*

C	A	D	0	5	0	8	0		8	5	0

Secondary ID Number *(enter from page 1)*

XI. Nature of Business *(provide a brief description)*

Provides offsite treatment, storage and transfer of hazardous waste. Wastewater with cyanide , Hexavalent Chrome, high and low ph, low VOC are treated on site and discharged through the city sewage system. All other hazardous waste are stored in drums, bulk in tanks and transhi -ped for incineration or further treatment offsite.

XII. Process - Codes and Design Capacities

A. **PROCESS CODE** - *Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in item XIII.*

B. **PROCESS DESIGN CAPACITY** - *For each code entered in column A, enter the capacity of the process.*

1. **AMOUNT** - *Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process unit.*
2. **UNIT OF MEASURE** - *For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.*

C. **PROCESS TOTAL NUMBER OF UNITS** - *Enter the total number of units used with the corresponding process code.*

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	DISPOSAL:	
D79	INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY
D80	LANDFILL	ACRE-FEET OR HECTARE-METER
D81	LAND APPLICATION	ACRES OR HECTARES
D82	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY
D83	SURFACE IMPOUNDMENT	GALLONS OR LITERS
	STORAGE:	
S01	CONTAINER (barrel, drum, etc.)	GALLONS OR LITERS
S02	TANK	GALLONS OR LITERS
S03	WASTE PILE	CUBIC YARDS OR CUBIC METERS
S04	SURFACE IMPOUNDMENT	GALLONS OR LITERS
	TREATMENT:	
T01	TANK	GALLONS PER DAY OR LITERS PER DAY
T02	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY
T03	INCINERATOR	SHORT TONS PER HOUR; METRIC TONS PER HOUR; GALLONS PER HOUR; LITERS PER HOUR; OR BTU'S PER HOUR
T04	OTHER TREATMENT (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundment or incinerators. Describe the processes in the space provided in item XIII.)	GALLONS PER DAY; LITERS PER DAY; POUNDS PER HOUR; SHORT TONS PER HOUR; KILOGRAMS PER HOUR; METRIC TONS PER DAY; METRIC TONS PER HOUR; OR SHORT TONS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
GALLONS PER HOUR	E
GALLONS PER DAY	U
LITERS	L
LITERS PER HOUR	H
LITERS PER DAY	V
SHORT TONS PER HOUR	D
METRIC TONS PER HOUR	W
SHORT TONS PER DAY	N
METRIC TONS PER DAY	S
POUNDS PER HOUR	J
KILOGRAMS PER HOUR	R
CUBIC YARDS	Y
CUBIC METERS	C
ACRES	B
ACRE-FEET	A
HECTARES	Q
HECTARE-METER	F
BTU's PER HOUR	K

EPA I.D. Number *(enter from page 1)*: C A D 0 5 0 8 0 6 8 [illegible] Q

Secondary ID Number *(enter from page 1)*:

II. Process – Codes and Design Capacities *(continued)*

EXAMPLE FOR COMPLETING ITEM XII (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

Line Number	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	C. PROCESS TOTAL NUMBER OF UNITS	FOR OFFICIAL USE ONLY
X 1	S 0 2	600	G	0 0 2	
X 2	T 0 3	20	E	0 0 1	
1	S 0 1	140,540	G		
2	S 0 2	600, 000	G		
3	T 0 1	380,500	U		
4	T 0 4	50, 000	U		
5					
6					
7					
8					
9					
10					
11					
12					

NOTE: If you need to list more than 12 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for additional treatment processes in item XIII.

III. Additional Treatment Processes *(follow instructions from item XII)*

Line Number (enter numbers in sequence with item XII)	A. PROCESS CODE	B. TREATMENT PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. TREATMENT PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	C. PROCESS TOTAL NUMBER OF UNITS	D. DESCRIPTION OF PROCESS
	T 0 4	2000	u		Lab packs
	T 0 4	43,000	U		Bulking
	T 0 4	5000	U		Solidfiction,and or stabilization and encaipsolution.
	T 0 4				

ATTACHMENT 5

SETS OF DOCUMENTS REQUESTED FROM ROLLINS OPC ON THE MORNING OF INSPECTION

RCRA COMPLIANCE EVALUATION INSPECTION
OIL PROCESS COMPANY

JUNE 18, 1993

The following sets of documents are requested from the Oil Process Company facility to assist S.A.I.C. inspectors in evaluating compliance to RCRA regulations. Where copies are requested, please provide photocopies.

1. Copies of manifest sets for waste received on December 21, 1992 and March 2, 3 and 12, 1993 (including waste acceptance analytical results)

2. Copies of Daily Inspection Remedial Work Orders for the period March 1- March 27, 1993

3. A copy of the current inspection schedule as required by 40 C.F.R. 264.15(b)

4. All November 1992 completed manifest sets for Oil Process Company generated waste sent to Chemical Waste Management - Kettleman Hills and to Rollins Environmental Services in Deer Park, Texas

5. A copy of Oil Process Company's current statement of Financial Assurances and Closure Cost Estimates

6. Copies of all 1992 Twenty-four Hour Reporting documents

7. Copies of the training records for the following employees:

   _____
   _____
   _____
   _____
   _____

8. The Biennial Report submitted in 1992 (for 1991)

9. The Contingency Plan

10. The Waste Analysis Plan

11. The Waste Minimization Plan

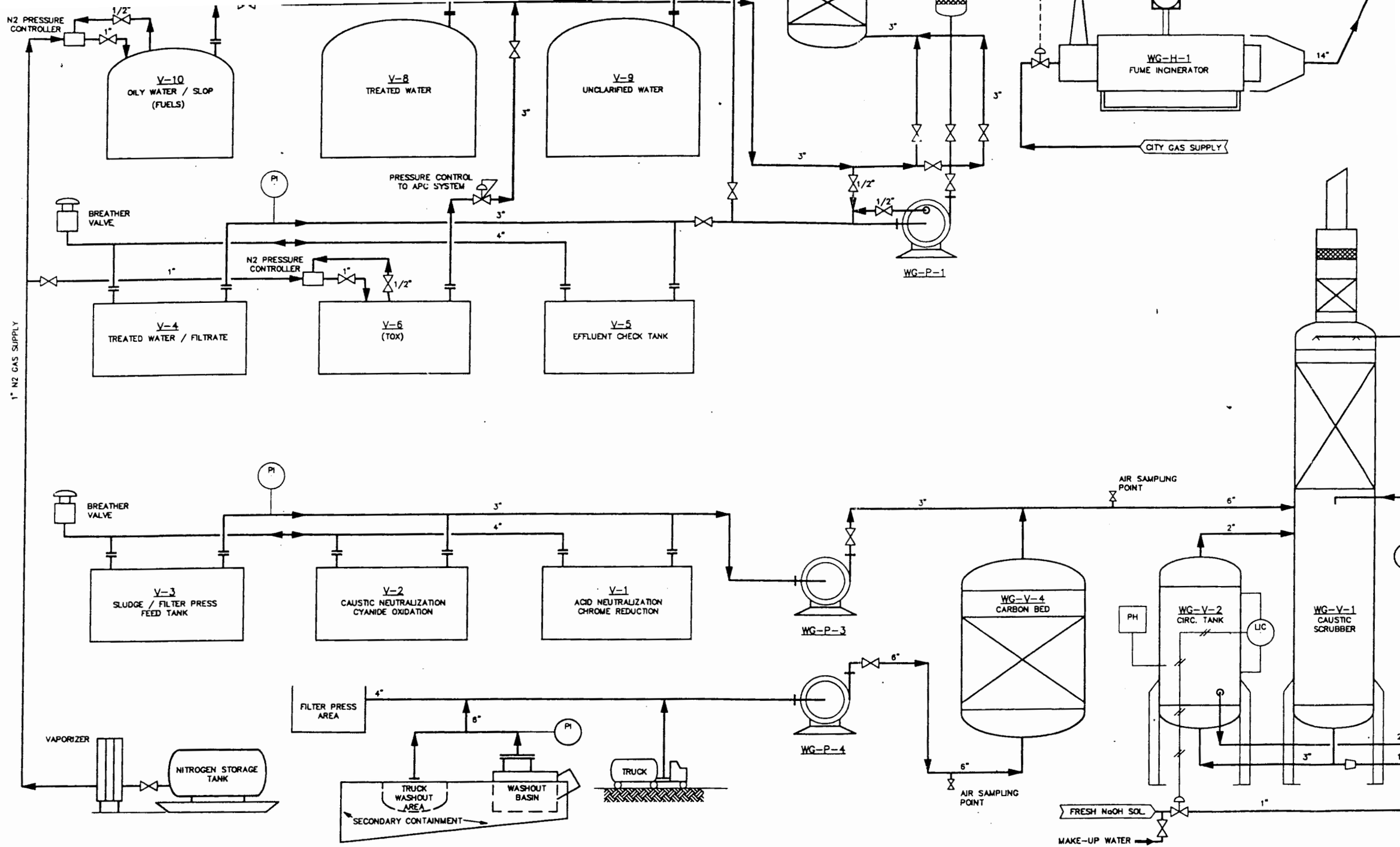
RCRA COMPLIANCE EVALUATION INSPECTION
Oil Process Company
June 18, 1993

12. Copies of Drum Storage Area Inspection documentation for the period January 1, 1993 - March 27, 1993

16. Copies of the Daily Tank System Inspection documentation for the period March 1, 1993 - March 27, 1993

ATTACHMENT 6

WASTE WATER TREATMENT UNIT SYSTEM DIAGRAM



NUMBER	REFERENCE DRAWINGS

NOTES:

REV	DATE	ISSUE	BY	CHECKED	APPROVED	DRW

ATTACHMENT 7

WASTE BATCH 484
DRUM SAMPLE INTERNAL LABORATORY REPORTS

<8

DRUM SAMPLE
INTERNAL LABORATORY REPORT

GENERATOR: OPC Rockwell INT
TRANSPORTER:
VOLUME: 1X30 + 3X55
MAINFEST NO:
EPA WST CODE:
STATE CODE :

DATE SAMPLED: 05-06-93
SAMPLE NO. : S-15602
SAMPLED BY : Celso
OPC WST CODE:
TIME RECEIVED:
TESTS REQUESTED:

BTU/ASH/SCRUB

	COMPOSITE	LAYER 1(TOP)	LAYER 2	LAYER 3(BOTTOM)
BTU/lb				
ASH(%)				
SCRUB(%)				

COMPOSITION

MISCIBLE (%)
HYDROCARBONS(%)
ORGANICS (%)
SOLID (%)

METALS

ANTIMONY	4.0
ARSENIC	<1.0
BARIUM	20.5
BERYLLIUM	<0.5
CADMIUM	<1.0
CHROME(HEX)	
CHROME(TOTAL)	0.8
COBALT	<1.0
COPPER	1.1
LEAD	1.4
MERCURY	<0.2
MOLYBDENUM	<1.0
NICKEL	1.5
SELENIUM	<1.0
SILVER	<0.7
TEALLIUM	<1.0
VANADIUM	<1.0
ZINC	1257

INORGANIC AND PHYSICAL

SODIUM	3886
POTASSIUM	44380
SULFUR	526
pH	713.0
SPECIFIC GRAVITY	
FLASH POINT	

LAYERS: (Check One Only)

SINGLE_____ BI _____ MULTI_____

NH_3 2500

CN- 60ppm

COMMENTS:

SAMPLER SIGNATURE: [signature] RELINQUISHED DATE: 5-7-93 TIME: 7:30

RECEIVED BY: N M RECEIVED DATE: 5-7-93 TIME: 7:30

ANALYST: PM

DATE ANALYTICAL COMPLETED: 5-6-93

TIME ANALYTICAL COMPLETED: 7:40pm

PERSON RECEIVING THE REPORT:

TREATMENT PLANT LAB REPORT

E NAME: V-7 B-484 DATE SAMPLED: 6-7-93

ENCE: SAMPLE NUMBER: 6-8658

SAMPLER: Jesus

DESCRIPTION: TEST REQUEST** PH, metals, NH_3 & CN^-

		INORGANICS		ORGANICS (601,602)	
ony	<1.0	pH	13.2	Dichlorodifluoromethane	
.c	<1.0	Cyanide	5	Trichlorofluoromethane	
m	<1.0	Sulfide		1,1-Dichloroethane	
lium	<1.0	Flash Point		Methylene Chloride	
m	1.1	Specific Gravity		trans-1,2-Dichloroethylene	
ium(hex)	—			cis-1,2-Dichloroethylene	
ium(total)	4.2	Physical State		1,1-Dichloroethylene	
	<1.0	Single		Chloroform	
	115	Bilayer		1,1,1-Trichloroethane	
	46	Multilayer		Carbon Tetrachloride	
ry	—			1,2-dichloroethane	
enum	1.8	Sample Color		Trichloroethylene	
	<1.0	Sample Odor		1,2-Dichloropropane	
ium	2.6	Miscible Component(%)		Bromodichloromethane	
r	2.8	Hydrocarbon Comp (%)		2-Chloroethyl Vinyl Ether	
um	<1.0	Solid Component(%)		trans-1,3-Dichlorpropane	
um	30			cis-1,3-Dichloropropane	
	395	BTU(Composite)BTU/lb		1,1,2-Trichloroethane	
		Ash(%)		Tetrachloroethylene	
TALLIC IONS		Scrub(%)		Dibromochloromethane	
				Chlorobenzene	
ide		BTU(Hydrocarbon)BTU/lb		Bromoform	
ide		Ash(%)		1,1,2,2-Tetrachloroethane	
e		Scrub(%)		1,3-Dichlorobenzene	
ate				1,4-Dichlorobenzene	
te		BTU(Miscible)BTU/lb		1,2-Dichlorobenzene	
				Approximate Unknowns	
um	2500				
ium				Benzene	
m				Toluene	
				Chlorobenzene	
				Ethylbenzene	
				Para+meta-Xylene	
NTS:				ortho-Xylene	
				1,3-Dichlorobenzene	
				1,4-Dichlorobenzene	
				1,2-Dichlorobenzene	
				Approximate Unknowns	

ER SIGNATURE:

VED BY: RELINQUISHED DATE: 6-7-93 TIME: 13:35

ISHED BY: RECEIVED DATE: TIME:

CAL COMPLETED: DATE: TIME:

DATE: TIME:

ANALYST: C.Y.

RECID DATE	TIME	MANIFEST	OP#	UNITS BULK	GAL. VOLUME	LAB # SAMPLE	BATCH=	TANK #	GENERATOR	WASTE DESCRIPTION	RECID BY
6-2-93	06:00 12. PM	92736406	15114	1-units	55	5-15702	482	V-1	H.E. TEXTRON	CLA'S	JV/H.A.
6-2-93	"	92058193	15044	1-unit	50	5-15702	482	V-1	SANYO E.+E.	CLA	"
6-2-93	"	92736407	15114	1-unit	55	5-15702	482	V-1	R.I. TEXTRON	CLA	"
6-2-93	"	92819544	14891-40	4-units	220	5-15702	482	V-1	COORS CERAMICS	CLA'S	"
6-2-93	"	89822071	11560	4-units	220	5-15674	482	V-1	I.T. CORPORATION	CLA'S	"
6-2-93	"	89822071	11570	6-units	330	5-15674	482	V-1	I.T. CORPORATION	CLA'S	"
6-2-93	"	92737096	13057	1-unit	55	5-15674	482	V-1	CATALITICA.	CLA	"
6-2-93	"	92737095	14954	1-unit	55	5-15674	482	V-1	3-COM CORP.	CLA	"
6-2-93		90911912	13628	1-UNIT	30	5-15674	482	V-1	E.G.&G. ROCKY	CLA	"
6-2-93	"	-	-	1-UNIT	55	5-15674	482	V-1	CPC # 0513-01	CLA	"
6-2-93	"	92730206	15026	5-units	275	5-15674	482	V-1	ESL INC.	CLA	"
6-3-93	12:PM	92521732		BULK	1,534	6-15787	483	V-2	V.S ENVIRONMENTAL	WATER CONTAMIN WITH PHOSPHORUS	JESUS/JUNIOR
6-7-93	08:00 13:00	89822072	10183	1-unit	55	5-15689	484	V-2	I.T. CORPORATION.	CLB'S	JESUS HUMBER
6-7-93	"	—	—	2-unit	110	5-15689	484	V-2	O.P.C. # 0517-01 0517-02	CLB'S	"
6-7-93	"	90476702	15042	1-unit	55	5-15689	484	V-2	SITHE ENERGY	CLB'S	"
6-7-93	"	92058063	14918-39	4-unit	205	5-15639	484	V-2	R.A HANSON	CLB'S	"
6-7-93	"	90945019	10249	3-units	140	4-15477	484	V-2	REECO	CLB'S	"
6-7-93	"	90943148	14748	3-units	165	4-15477	484	V-2	THE DOW CHEMICAL	CLB'S	"
6-7-93	"	90943361	12699	1-unit	55	4-15477	484	V-2	NATIONAL CAN AMERICAN	CLB	"
6-7-93	"	92058068	14785	1-unit	55	4-15737	484	V-2	COLUMBIA	CLB	"
6-7-93	"	89472944	14671	1-unit	55	5-15581	484	V-2	EAGLE PACKAGING.	CLB	"
6-7-93	"	90933260	14281	1-unit	55	4-15447	484	V-2	B.C. ANALYTICAL	CLB	"

RECD DATE	TIME	MANIFEST #	OP#	UNITS BULK	VOLUME GALS.	LAB # SAMPLE	BATCH#	TANK #	GENERATOR	DESCRIPTION	RECD
6-7-93	08:00 13:00	92746168	14668	1-UNIT	30	5-15602	484	V-2	RACKWELL INT.	CLB	JESUS
6-7-93	"	—	—	3-UNITS	165	5-15602	484	V-2	O.P.C. #0506-01, 0506-02 #0506-03	CLB'S	"
6-7-93	"	90943361	12699	2-UNITS	100	5-15633	484	V-2	AMERICAN NATIONAL CAN	CLB'S	"
6-7-93	"	—	—	2-UNIT	110	5-15633	484	V-2	O.P.C. #0510-04 #0511-02	CLB'S	"
6-7-93	"	89472766	13436	1-UNIT	55	3-15383	484	V-2	CHIRON CORP.	CLB	"
6-7-93	"	92496559	014476	2-UNITS	110	3-15383	484	V-2	B.T.S GROUP.	CLB'S	"
6-7-93	"	92501632	11877	3-UNITS	165	4-15523	484	V-2	LORAL SPACE SYSTEM.	CLBS	"
6-7-93	"	92685705	14531	1-UNIT	30	4-15523	484	V-2	STATE FARM INSURANCE	CLB	"
6-7-93	"	89472825	15060	2-UNITS	110	5-15642	484	V-2	ADVANCE MICRO	CLBS	"
6-7-93	"	90943957	13991	1-UNIT	30	4-15422	484	V-2	MCDONNEL DOUGLAS	CLB'S	"
6-7-93	"	90943956	10341	1-UNIT	30	4-15422	484	V-2	AEROJET E.S.	CLB	"
6-7-93	"	90943367	10249	2-UNITS	110	5-15712	484	V-2	REECO	CLBS	"
6-9-93	12:00	92736968	15145-40	8-UNITS	440	6-15815	484	V-2	T.R.W.		
6-8-93	11:00 12:30	92521261	14773	BULK	4,338	6-15829	485	V-1	METROPOLITAN WATER DISTRICT	WATER CONTANING COPPER SULFATE	JESUS HUMBE
6-9-93	07:30 08:40	92521265	14773	BULK	1,600	6-15842	485	V-1	METROPOLITAN WATER DISTRICT.	WATTER CONTAINING COPPER SULFATE	JESUS (HUMBE
6-10-93	09:30 10:15	93102850	10314-41	BULK	2,265	6-15843	479	V-1	T.R.W. SPACE	GROUND WATER WITH TRACE OF HALOGENATED ORGANICS HAZARDOUS LIQUID. (BARIUM CHLORIDE)	JESUS HUMB
6-10-93	10:30 11:00	92660615		BULK	1,072	6-15851	479	V-1	ALPHA TERAPEUTIC		JESUS HUMB
6-16-93	09:00 11:00	90781474	13211-40	9-UNITS	495	6-15815	486	V-1	ROCKWELL INTERNATONAL	CLA'S	JESUS HUMBER
6-16-93	"	92329750	11833	1-UNIT	55	6-15890	486	V-1	ADVANCED	CLA'S	"
6-16-93	"	92736453	15209	1-UNIT	55	6-15890	486	V-1	INTERNATIONAL MATEX TANK.	CLA'S	"
6-16-93	"	92501753	10634	1-UNIT	30	6-15815	486	V-1	GENETECH.	CLA'S	"
6-16-93	"	—	—	1-UNIT	55	6-15815	486	V-1	O.P.C. # 0604-01	CLA'S	"

ATTACHMENT 8

INSPECTION LOG INDICATING CORRECTION

ROLLINS / OPC
5756 Alba Street
Los Angeles, Calif.

BULK LIQUID AND SOLID CONTAINER AREA INSPECTION LIST

Bulk Liquid Container Area

1) Is there indication of any new damage to the Vacuum trailers?....YES (NO)

2) Are there any noticeable leaks or spills under or around the bulk liquid container trailers?.....(YES) NO

OIL SPILL Covered WITH VERMIC DEP-700 1-28-93 PM

3) Are all hatches and caps secured on the trailers?.....(YES) N

4) Are any yard vacuum hoses torn or smashed so as to make them unsafe for use?.....YES (N

5) Are proper manifests attached to all loaded trailers?.....(YES) NO

6) Is manifest(s) signed off by OPC?.....(YES) N

6A) If the manifest is not signed is the load going to another TSD? (YES) NO
6b) has it been here for more than 6 days?.....YES (N

7) Are all loaded trailers properly placarded?.....(YES) NO

8) Is there adequate aisle space between trailers?.....(YES) NO

9) Is this area free from debris or other items that do not belong here(drums, pails, pallets)?.....(YES) NO

Rolloff Container Areas

10) Are all rolloff's free from new damage?.....(YES) NO

11) Are there any noticeable leaks or spills under or around the rolloff container areas?.....YES (NO)

12) Are all rolloffs tarped and are the tarps secured so no rain water will enter them?.....(YES) NO

13) Are proper manifest(or hazardous waste labels for OPC Waste) attached to all loaded rolloff boxes?.....(YES) NO

14) Are all manifest signed off by OPC(or accumulation start dates for labels)?.....(YES) NO

15) Are all rolloffs properly placarded?.....(YES) NO

16) Is there adequate aisle space between rolloff boxes?.....(YES) NO

17) Is this area free from debris or other items that do not belong here(drums, pails, pallets)?.....(YES) NO

18) Has the daily inventory sheet been completed?.....(YES) NO

If any problems are noted during the inspection please list item # explanation and any corrective action taken on the back.

Inspected by AC Date 1-29-93 Time 3:00 PM